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10 Attorneys for Plaintiff

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION

14 UNITED STATES OF AMERICA,) No. CR-11-00742 SBA
15 Plaintiff,) STIPULATED REQUEST TO SET
16 v.) HEARING DATE ON JULY 12, 2012 AND
17 VISHAL DASA,) TO EXCLUDE TIME UNDER THE
18 ANJI REDDY DIRISANALA,) SPEEDY TRIAL ACT
19 TAMAKRISHNA REDDY KARRA, and) Date: July 12, 2012
TUSHAR TAMBE,) Time: 9:30 a.m.
Defendants.) Court: Hon. Donna M. Ryu

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22 The above-captioned matter was previously scheduled on May 1, 2012 before the Hon.
23 Saundra Brown Armstrong for status. Pursuant to Judge Armstrong's April 30, 2012 order,
24 directing all parties to reschedule matters before the Magistrate Judges, the parties jointly request
25 that the Court re-schedule the matter for July 12, 2012 at 9:30 a.m. before this Court for status
26 and that the Court exclude time under the Speedy Trial Act between the date of this order and
27 July 12, 2012.

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STIP. REQ. AND [PROPOSED] ORDER TO SET
HEARING ON JULY 12, 2012 AND TO EXCLUDE TIME
No. CR-11-00742 SBA

1 On October 7, 2011, the United States Attorney filed a one-count Information charging
2 the four Defendants with Conspiracy to Commit Visa Fraud in violation of 18 U.S.C. §§ 371,
3 1546(a). On October 11, 2011, each Defendant waived indictment and entered a not guilty plea.

4 By way of background, this case is related to a larger investigation involving Tri-Valley
5 University (TVU) and its former President, who is charged in a 35-count superseding indictment
6 in United States v. Susan Xiao-Ping Su, CR-11-00288 SBA, arising from her creation and
7 operation of TVU. That case is set for trial on October 22, 2012.

8 The four Defendants in the current case require additional time to review previously
9 provided discovery, which includes information seized from TVU's computers during search
10 warrants and to confer with government counsel. Additionally, the United States intends on
11 producing supplemental discovery to each of the four Defendants relating to further investigation
12 of this case. A thorough review of the electronic evidence seized from TVU is necessary to
13 accurately calculate the Sentencing Guidelines for each of the four Defendants. Against this
14 backdrop, the parties require additional time to review discovery and to confer regarding an
15 anticipated joint negotiated disposition.

16 On that basis, the parties jointly request that the matter be placed before this Court for
17 status on July 12, 2012 at 9:30 a.m. and that the Court exclude time under the Speedy Trial Act
18 between the date of this order and July 12, 2012. The parties agree that the extension is not
19 sought for delay. The parties further agree the ends of justice served by granting the continuance
20 outweigh the best interests of the public and the defendant in a speedy trial. Therefore, the
21 parties further stipulate and request that the Court exclude time between the date of this order and

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STIP. REQ. AND [PROPOSED] ORDER TO SET
HEARING ON JULY 12, 2012 AND TO EXCLUDE TIME
No. CR-11-00742 SBA

1 July 12, 2012 under the Speedy Trial Act for effective preparation of defense counsel and
2 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

3 DATED: May 21, 2012

4
5 /s/
6 HARTLEY M.K. WEST
WADE M. RHYNE
7 Assistant United States Attorneys
Counsel for United States

8 /s/
9 KENNETH MCGUIRE
Counsel for Tushar Tambe
10

11 /s/
12 GINNY H.K. WALIA
Counsel for Ramakrishna Reddy Karra
13

14 /s/
15 GALIA AMRAM PHILLIPS
Counsel for Anji Reddy Dirisanala
16

17 /s/
18 ANGELA HANSEN
Assistant Federal Public Defender
Counsel for Vishal Dasa
19

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

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|----|------------------------------|---|-----------------------------------|
| 11 | UNITED STATES OF AMERICA, |) | No. CR-11-00742 SBA |
| 12 | Plaintiff, |) | [PROPOSED] ORDER GRANTING |
| 13 | v. |) | STIPULATED REQUEST TO SET |
| 14 | VISHAL DASA, |) | HEARING DATE ON JULY 12, 2012 AND |
| 15 | ANJI REDDY DIRISANALA, |) | TO EXCLUDE TIME UNDER THE |
| 16 | TAMAKRISHNA REDDY KARRA, and |) | SPEEDY TRIAL ACT |
| 17 | TUSHAR TAMBE, |) | Date: July 12, 2012 |
| 18 | Defendants. |) | Time: 9:30 a.m. |
| | |) | Court: Hon. Donna M. Ryu |

The above-captioned matter was previously scheduled on May 1, 2012 before the Hon. Saundra Brown Armstrong for status. Pursuant to Judge Armstrong's April 30, 2012 order, directing all parties to reschedule matters before the Magistrate Judges, the parties jointly requested that the Court re-schedule the matter for July 12, 2012 at 9:30 a.m. before this Court for status and that the Court exclude time under the Speedy Trial Act between the date of this order and July 12, 2012.

On October 7, 2011, the United States Attorney filed a one-count Information charging the four Defendants with Conspiracy to Commit Visa Fraud in violation of 18 U.S.C. §§ 371, 1546(a). On October 11, 2011, each Defendant waived indictment and entered a not guilty plea.

STIP. REQ. AND [PROPOSED] ORDER TO SET
HEARING ON JULY 12, 2012 AND TO EXCLUDE TIME
No. CR-11-00742 SBA

This case is related to a larger investigation involving Tri-Valley University (TVU) and its former President, who is charged in a 35-count superseding indictment in United States v. Susan Xiao-Ping Su, CR-11-00288 SBA, arising from her creation and operation of TVU. That case is set for trial on October 22, 2012.

The four Defendants in the current case each indicate that they need additional time to review previously provided discovery, which includes information seized from TVU's computers during search warrants. Additionally, the United States indicates that it intends on producing supplemental discovery to each of the four Defendants relating to further investigation of this case. According to the parties, a thorough review of the electronic evidence seized from TVU is necessary to accurately calculate the Sentencing Guidelines for each of the four Defendants. Therefore, the parties require additional time to review discovery and to confer regarding an anticipated joint negotiated disposition. The parties agree that the extension is not sought for delay and that the ends of justice served by granting the continuance outweigh the best interests of the public and the defendant in a speedy trial.

For these stated reasons, the Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and the defendant in a speedy trial. Good cause appearing therefore, and pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), **IT IS HEREBY ORDERED** that the hearing in this matter is continued from today's date to July 12, 2012 at 9:30 a.m. for status and that time between today and July 12, 2012 is excluded under the Speedy Trial Act to allow for the effective preparation of defense counsel, taking into account the exercise of due diligence.

DATED:

HON. DONNA M. RYU
United States Magistrate Judge